

Major MACT 2 Area (MM2A): National Emission Standards for Hazardous Pollutants - Summary of Reclassification Activities

Region	State	Facility	Previous Applicable Major Source Standard	Applicable or Potentially Applicable Area Source Standard	Reclassification Mechanism Used
1	MA	Fairhaven Shipyard Companies, Inc	Subpart II - Shipbuilding and Ship Repair	--	Administrative Amendment to Air Quality Plan Approval ¹ ; Title V Operating Permit Revoked.
	ME	Talaria Company, LLC	Subpart VVVV - Boat Manufacturing;	--	Synthetic Minor Source License Renewal/Minor Modification ² .
4	NC	Heritage Home Group LLC	Subpart JJ - Wood Furniture Manufacturing Operations; Subpart DDDD - Plywood and Composite Wood Products; Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters	-- -- --	Significant Modification to Title V Operating Permit ² .
	NC	Heritage Home Group LLC – Hickory Chair	Subpart DDDD- Plywood and Composite Wood Products; Subpart JJ - Wood Furniture Manufacturing	-- --	Significant Modification to Title V Operating Permit ² .
	GA	Geiger International, Inc.	Subpart JJ - Wood Furniture Manufacturing	--	Synthetic Minor Source Permit/Federal Enforceable State Operating Permit (FESOP).
	MS	Denbury Onshore LLC, Little Creek EOR Facility	Subpart HH – Oil and Natural Gas Production	Subpart HH - Area ²	Significant Modification to Title V Operating Permit ² .
	SC	Highland Industries Inc.	Subpart OOOO - Printing, Coating, and Dyeing of Fabric and Other Textiles	--	Minor Modification to Title V Operating Permit ² ; Natural Area Source.
5	MI	Ford Motor Company, Romeo Engine Plant	Subpart ZZZZ – Reciprocating Internal Combustion Engines (RICE)	Subpart ZZZZ – Area RICE	Synthetic Minor New Source Review Permit to Install ² .
	MI	UniFirst Corporation	Subpart DDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters	--	Synthetic Minor New Source Review Permit to Install ² .
5	IN	Kimball Salem Wood Office Furniture	Subpart JJ - Wood Furniture Manufacturing Operations	--	FESOP Renewal.

¹ Permit program is federally enforceable.² Not listed in permit.

Region	State	Facility	Previous Applicable Major Source Standard	Applicable or Potentially Applicable Area Source Standard	Reclassification Mechanism Used
5	IN	Transmontaigne, Evansville Terminal	Subpart R - Bulk Gasoline Terminals and Pipeline Breakout Stations; Subpart Y - Marine Tank Vessel Loading Operations; Subpart EEEE – Organic Liquids Distribution	Subpart BBBB - Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities -- --	FESOP Renewal.
	IN	2700 Real Estate Holdings, LLC	Subpart MMMM - Surface Coating for Miscellaneous Parts and Products	Subpart CCCCCC – Gasoline Dispensing	FESOP Administrative Amendment.
	IN	Vanguard National Trailer Corporation	Subpart MMMM - Surface Coating Miscellaneous Metal Parts and Products; Subpart DDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters	-- Subpart ZZZZ – Area RICE Subpart CCCCCC – Gasoline Dispensing	Title V Renewal Permit ² ; Natural Area Source.
6	OK	Enable Midstream Partners, LP ³	Subpart ZZZZ - Reciprocating Internal Combustion Engines (RICE)	Subpart ZZZZ – Area RICE	Applicability Determination states source reduced the facility-wide PTE HAP below major source levels prior to replacing old engines with new (4SLB) engines.
	OK	ONEOK Field Services Company, Booster Station ⁴	Subpart ZZZZ – Reciprocating Internal Combustion Engines (RICE)	Subpart ZZZZ – Area Rice	Revision to Title V Operating Permit ² .
7	IA	Meridiam Manufacturing Group	Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products	Subpart XXXXXX – 9 Metal Fabrication and Finishing Source Categories	Construction Permit ² .

³ Applicability Determination that EPA consulted on.

⁴ Applicability Determination that EPA consulted on.

Region	State	Facility	Previous Applicable Major Source Standard	Applicable or Potentially Applicable Area Source Standard	Reclassification Mechanism Used
8	WY	WGR Operating, LP's Granger Gas Plant	Subparts HH - Oil and Natural Gas Production Facilities Subpart ZZZZ - RICE	Subparts HH - Area Subpart ZZZZ – Area	Title V Operating Permit ² .
	Indian Country, Ute Indian Tribe, CO	Andeavor Field Services, LLC Ponderosa Compressor Station	Subpart HH - Oil and Natural Gas Production Facilities	Subpart HH – Area	Synthetic Minor New Source Review Permit ² .

**Major MACT 2 Area (MM2A): National Emission Standards for Hazardous Pollutants
General Provisions Amendments**

Summary of reclassification activities – working document

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
1	VT	Shelburne Shipyard Incorporated	Subpart II (Shipbuilding and Ship Repair)	40 CFR Part 63 Subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources)	Minor source Permit to Construct- Draft ; 1/23/18
	ME	Talaria Company, LLC d/b/a The Hinckley Company, LLC	Subpart VVVV (Boat Manufacturing); Subpart II (Shipbuilding and Ship Repair - surface coating) Subpart PPPP (Surface Coating of Plastic Parts and Products)	No area source rule in crosswalk.	Minor Modification to an Air Emission License (Renewal and Amendment) - Final ; 5/4/18; revoked Title V Permit. Limited (80% synthetic minor source)
	MA	Fairhaven Shipyard Companies, Inc., North Shipyard	Subpart II (Shipbuilding and Ship Repair)	Doesn't note any applicable area source rule requirement.	(b)(5) Deliberative Process Privilege Final Air Quality Operating Permit Revocation, Permit No. SE-16-014, Administrative Amendment to Plan Approval No. SE-12-030, both dated 9/28/18 Has a federally enforceable permit limit below tv thresholds for PM, HAP, and VOC (area source status); uses VOC compliance coatings.
4	NC	Heritage Home Group LLC - Thomasville Furniture	Subpart JJ (Wood Furniture Manufacturing Operations); Subpart DDDD (Plywood and Composite Wood Products);	Subpart ZZZZ (area source RICE); Subpart JJJJJ (area source boilers)	(b)(5) Deliberative Process Privilege

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
		Industries, Lenoir Plant	Case-by-case Boiler MACT		Final Title V Operating Permit No. 04172T26; dated 6/9/18 (effective 30 days after)
	GA	Geiger International, Inc.	Subpart JJ (Wood Furniture Manufacturing)		Final Synthetic Minor Source Permit No. 2521-121-0558-S-05-0 Limited to 25 T/Yr VOC and limited to 10/25 T/Yr HAP. Removed TV permit requirement; 4/27/18
	MS	Denbury Onshore LLC, Little Creek EOR Facility	Subpart HH (O&G Natural Gas Production Facilities)	Subpart HH - Area	Final Title V Permit, Significant Modification; 8/2/18
	NC	Heritage Home Group LLC – Hickory Chair	Subpart DDDD (Plywood and Composite Wood Products and Subpart JJ (Wood Furniture Manufacturing)	Subpart JJJJJ (Industrial, Commercial, and Institutional Boilers)	Final Air Quality Permit No. 02779T25; dated 6/15/18
	NC	Triangle Brick Company, Wadesboro	Case by Case Brick Requirements, brick manufacturing facility and will also avoid Subpart JJJJJ, Brick and Structural Clay (compliance required by Dec 2018).		(b)(5) Deliberative Process Privilege
	SC	Highland Industries Inc. Cheraw (textile manufacturing)	Subpart OOOO (Printing, Coating, and Dyeing of Fabric and Other Textiles)		Final Minor Mod to Title V Operating Permit, dated 6/4/18, true minor
5	MI	Ford Motor Company-Romeo Engine Plant B2869	Subpart ZZZZ (RICE)	Subpart ZZZZ (area source RICE)	Synthetic Minor NSR/Permit to Install Final ; 3/13/18
	MI	UniFirst Corporation Pontiac MI	Subpart DDDDD (Boiler MACT)		Synthetic Minor NSR/Permit to Install- Final ; 4/10/18
	MI	Ford Motor Company Livonia Transmission Plant			Synthetic Minor NSR/Permit to Install- Final ; 5/1/18
	MI	Gage Products Company (Solvent	Subpart A and DD (Off-site Waste and Recovery Operations) (tanks subject to		Synthetic Minor Permit-Renewable Operating

(b)(5) Deliberative Process Privilege

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
		blending and recycling)	LDAR); subpart H (Equipment leaks); subpart OO (Tanks); subpart PP (drums)		Permit/Permit to Install- Under development. Source already has a blanket synthetic minor HAP limits taken after the MACT compliance date- ** the plant achieved synthetic minor status in 04/03/2003 but remained subject to subpart DD because of OIAI
	MO				
	IN	Kimball Office Salem Wood Office Furniture	Subpart JJ (Wood Furniture Manufacturing Operations)		Federally Enforceable State Operating Permit (FESOP)/ Minor Source under PSD- Final ; 4/26/18
	IN	Transmontaigne, Evansville Terminal	Subpart R (Bulk Gasoline Terminals and Pipeline Breakout Stations); Subpart Y (Marine Tank Vessel Loading Operations); Subpart EEEE (OLD Non-Gasoline);	Subpart A and Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities)	Final FESOP renewal; Permit No. 163-38296-00063; dated 4/6/18; included revisions to permit reqts; permittee is limiting it's PTE below 10 for multiple indiv HAP/ below 25 tpy HAP for aggregate HAP, not a title v facility.
	IN	2700 Real Estate Holdings, LLC, Elkhart	Subpart MMMM (Surface Coating for Miscellaneous Parts and Products)	Subpart A and subpart CCCCCC (b)(5) Deliberative Process Privilege	Final FESOP amendment; Permit No. 039-39787-00182; dated 4/17/18; unlimited PTE is < 10/25 tpy HAP (natural area source), also minor for criteria pollutants, no title v req.
	IN	Vanguard National Trailer Corporation	Subpart MMMM (Surface Coating Miscellaneous Metal Parts and Products); subpart DDDDD (Commercial, and Institutional Boilers and Process Heaters;	Subpart A and subpart ZZZZ, RICE (unrelated to reclassification);	Final Title V Renewal Permit No. 181-38409-00043; limited PTE < 24 tpy (total HAP) and all individual HAP < 10 tpy; still a title v source; dated 4/18/18.

(b)(5) Deliberative Process Privilege

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
				Subpart CCCCC (Gasoline Dispensing Facilities) (unrelated to reclassification) (b)(5) Deliberative Process Privilege	
	MN	Hill Wood Products	Subpart DDDDD (Boiler MACT); Subpart DDDD (Plywood and Composite Wood Products); Subpart QQQQ (Surface Coating of Wood Products); Subpart ZZZZ (RICE)		State Registration Permit- Under development
	IL	Midwest Metal Coatings LLC			Federally Enforceable State Operating Permit (FESOP)/ Minor Source under PSD- Under development
5	WI	Hydrite	Off-site waste and recovery MACT		Preliminary information- Source working on application
	OH, permits online	Tower Industries, LTD			
6	OK, permits online	Enable Gas Gathering, LLC			8/17/2018?
7	IA	MidAmerican Energy Company – Riverside Generating Station Bettendorf, Iowa		LNG Vaporizers #1 and #2 (EU-70 and EU-71) and Auxiliary Boilers #1 and #2 (EU-87 and EU-88) are of the source category, but not subject to NESHAP Subpart JJJJJ (<i>Industrial, Commercial, and Institutional Boilers Area Sources</i>), because each of these units meets the definition of “ <i>gas-fired boiler</i> ” in 40 CFR §63.11237 of Subpart JJJJJ.	Final: July 3, 2018 Construction Permit- source requested restriction in natural gas usage so that facility may become an area source for NESHAP purposes. As a result of Project Number 18-194, Plant Number 82-02-006 has become a synthetic minor source for NESHAP purposes.


(b)(5) Deliberative Process Privilege

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
				Subpart UUUUUU applies to both major and area sources of HAP, as long as the electric utility steam generating unit burns coal or oil. Boiler #9 only burns natural gas, as a result, it is not an affected source under NESHAP Subpart UUUUUU.	Source will still be subject to Title V. (Major source for criteria pollutant) Major source for purposes of PSD.
	IA	Meridiam Manufacturing Group Storm Lake, IA makes agricultural bins, seeders, fuel tanks and other equipment. The processes are primarily metal cutting, welding and painting	Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products)	Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.) (b)(5) Deliberative Process Privilege	Air Quality Construction Permit Source will now be a minor for title V. Final: July 19, 2018


(b)(5) Deliberative Process Privilege

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
	IA	<p>Trustile Doors of Iowa</p> <p>is a wood door manufacturing facility located in Northwood, IA. The facility, which was previously owned by Woodharbor, manufactures various types of doors for residential and office settings.</p>	Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products)	<p>Source is not subject to: Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources - because the facility does not apply any coating to any metal or plastic surface. Per 40 CFR §63.11170, the facility is not subject to the Subpart.</p>	<p>Air Quality Construction Permit. Number: 03-A-1027-S2, Plant Number: 98-01-006</p> <p>The facility is required to track actual SHAP and THAP emissions from all non-combustion sources on a rolling 12-month basis. "The owner or operator shall not emit more than 9.0 tons of single HAP from all non-combustion sources at this facility per rolling 12-month period. The owner or operator shall not emit more than 24.0 tons of total HAP from all non-combustion sources at this facility per rolling 12-month period. These limits were established to limit HAP emissions below the area source HAP limits."</p> <p>Source is no longer major for Title V. The Title V major source thresholds for this facility are 10 TPY for SHAP, 25 TPY for THAP, and 100 TPY for all other criteria pollutants. The facility-wide PTE for all criteria pollutants is now below the Title V major source thresholds. Therefore, this facility is a minor source for the purposes of Title V at this time.</p>

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
	IA	IAC Iowa City LLC	Subpart PPPP – Surface Coating of Plastic Parts and Products (40 CFR §63.4480- 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP). However, this emission unit is not subject because the facility is an area source of HAP at this time and Subpart PPPP is only applicable to major sources of HAP.	<p>Source is not subject to Subpart HHHHHH (<i>National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources</i>; 40 CFR §63.11169 – §63.11180).</p> <p>However, this facility does not perform any paint stripping using methylene chloride or perform any spray application of coatings that contain target HAP, as defined in §63.11180 (coating containing compounds of chromium (Cr), lead (Pb), manganese (Mn), Nickel (Ni) or cadmium (Cd)), and therefore, Per 40 CFR §63.11170, is not subject to the Subpart.</p>	<p>Air Quality Construction Number: 03-A-1065-S4, Plant Number: 52-01-003 (project will Update VOC and HAP Limits, Update NESHAP Applicability)</p> <ol style="list-style-type: none"> 1. Facility-wide emission limit of 95.0 tons VOC per rolling 12-month period. This limit was established in Project 18-142 to restrict potential emissions of the facility below “major source” threshold for the purposes of Title V and Prevention of Significant Deterioration (PSD). The limit is for all non-combustion VOC emissions at the facility. 2. Facility-wide emission limits of 9.0 tons of any single HAP per rolling 12-month period. This limit was established in Project 18-142 to restrict potential emissions of the facility below “major source” threshold for the purposes of NESHAP applicability as defined in 40 CFR § 63.2. 3. Facility-wide emission limits of 24.0 tons of total HAP per rolling 12-month period. This limit was established in Project 18-142 to restrict potential emissions of the facility below “major source” threshold for

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
					the purposes of NESHAP applicability as defined in 40 CFR § 63.2.
	MO	City of Columbia's municipal power plant	Permit Proposed Removal of 40 CFR Part 63, Subpart ZZZZ (RICE) and [EP15, EP17, EP19] – In comments source requests to continue to comply with the MACT (Area Source more stringent)	Subject to Area Source Req't Under Subpart ZZZZ (RICE) Subpart JJJJJ (Indus, Com, Instl Boilers Area Sources	Draft Renewal Part 70 Permit to Operate (issued by Missouri Department of Natural Resources)  FW FYI - MM2A - City of Columbia MO The City of Columbia's municipal power plant had a coal fired boiler making them a major source for HAPs. The engines were complying with the major source requirements in Subpart ZZZZ. They stopped using coal. Now the source is an area source. They do not have the PTE to be major.
8	WY	WGR Operating, LP's Granger Gas Plant, Section 16 (sweet gas processing)	Subparts HH (OIL and Natural Gas Production Facilities) Subpart ZZZZ (RICE)		Final Operating Permit No. P0020683 4/24/18 (effective date); 9.5 TPY HAP Area source of HAP due to installation of TEG dehydration units.
	Indian Country, CO	Catamount Energy Partners, LLC - Ignacio Gas Treating Facility	ZZZZ (RICE)		Synthetic Minor Source NSR- Under development

Commented [DD5]: (b)(5) Deliberative Process Privilege

Region	State	Facility	Previous Applicable MACT standard (40 CFR Part 63)	Applicable Area Source	Reclassification Mechanism/Status
	Indian Country, Ute Indian Tribe, CO	Andeavor Field Services, LLC Ponderosa Compressor Station (Ponderosa).		subpart HH	Final signed by R8 05/18/18  RE Region 8 OIAI question and list.msg synthetic minor new source review (MNSR) permit (SMNSR-UO-0021782017.003) issued by the EPA in accordance with the Tribal Minor New Source Review Permit Program at 40 CFR part 49 and effective on April 6, 2017, which established emissions limits for volatile organic compounds and HAP.

From: [Dalcher, Debra](#)
To: [Burns, Ward](#)
Cc: [Torres, Elineth](#)
Subject: FW: FYI - MM2A - City of Columbia, MO issue
Date: Tuesday, August 14, 2018 1:54:03 PM
Attachments: [CMPP Draft Permit Comments Memo - 08-13-2018.pdf](#)

Hi Ward,

Please copy me on these actions so I can update the summary documents we are keeping.
Thanks!

Would it be possible to get a copy of the draft permit sent to the source for review. I want to check a few things.

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From: Torres, Elineth
Sent: Tuesday, August 14, 2018 12:36 PM
To: Dalcher, Debra <dalcher.debra@epa.gov>
Subject: FW: FYI - MM2A - City of Columbia, MO issue

Can you add to the list of reclassification actions and to the SP site folder?

Elineth Torres

OAQPS

919-541-4347

From: Burns, Ward
Sent: Tuesday, August 14, 2018 12:19 PM
To: Torres, Elineth <Torres.Elineth@epa.gov>
Subject: FYI - MM2A - City of Columbia, MO issue

The City of Columbia's municipal power plant had a coal fired boiler making them a major source for HAPs. The engines were complying with the major source requirements in Subpart ZZZZ. They stopped using coal. Now the source is an area source. They do not have the PTE to be major.

That makes them subject to the area source requirements of ZZZZ which is not an outcome they like.

We have not been involved with this but it seems a logical outcome.

Ward A. Burns, P.E.

Air Permitting and Compliance Branch

EPA Region 7

11201 Renner Boulevard

Lenexa KS 66219

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POWER ENGINEERS, INC.

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MEMORANDUM

DATE: August 13, 2018

TO: Missouri Department of Natural Resources (MDNR)

C: Christian Johanningmeier, City of Columbia (City)
Brian Petermann, POWER Engineers

FROM: Steven Babler, POWER Engineers

SUBJECT: Comments to Draft Title V

POWER Engineers on behalf of the City has performed a review of the Columbia Municipal Power Plant Draft Part 70 Permit to Operate issued to the City on August 1, 2018. Overall the draft permit looks good. Our only issue is with MDNR's proposed new Permit Condition 013 found on page 43 of the draft permit. For reference this proposed condition is restated below.

PERMIT CONDITION 013	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Unit	Description
EP15	Electric Generator #3 (Dana Corp) MHDR: 20.46 MMBtu/hr Output: 2,180 kW Fuel type: Diesel Construction year: 2004
EP17	Electric Generator #4 MHDR: 18.77 MMBtu/hr Output: 2,000 kW Fuel type: Diesel Construction year: 2001
EP19	Electric Generator #5 MHDR: 18.77 MMBtu/hr Output: 2,000 kW Fuel type: Diesel Construction year: 2001

Summary of City's Comment Regarding Proposed Condition 013

The City requests that the three subject engines be allowed to continue to comply with the provisions of 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

40 CFR Part 63, Subpart ZZZZ which apply to major sources of hazardous air pollutants (HAPS) and not be required to comply with the provisions which apply to area sources as specified in MDNR's proposed Condition 013. Our main justification for this is that area source emission requirements are more stringent than major source requirements within this source category, and the intent of eliminating the "once in, always in" policy is not meant to cause more stringent requirements on sources choosing to move from major source to area source status. This justification, among others are discussed below.

Background

Permit Condition 013 lists the Subpart ZZZZ requirements for EP15, EP17, and EP19. These new requirements are based on these engines being considered existing compression ignition (CI) reciprocating internal combustion engines (RICE) located at an area source of HAPS. Subpart ZZZZ requirements for this type of engine at an area source include the requirement to meet CO emission limits or CO emission reductions and parameter monitoring, stack testing, and reporting requirements.

In the current Columbia Municipal Power Plant Part 70 Permit EP15 has Subpart ZZZZ requirements listed in EP-15 Permit Condition 3 on page 15. In the current permit EP-15 is considered a new CI RICE located at a major source of HAPS and only subject to an initial notification requirement under Subpart ZZZZ (63.6590(b)). EP17 and EP19 have Subpart ZZZZ requirements listed in Water Treatment Plant Group Permit Condition 3 on page 16. EP17 and EP19 are considered existing CI RICE located at a major source of HAPS and are not subject to any Subpart ZZZZ requirements (63.6590(b)(3)).

On page SB-6 of the Statement of Basis of the draft permit MDNR states the reason for this requirements change is due to an EPA memorandum that was published on 1/25/2018 that rescinded the EPA's previous policy of "once in, always in". The "once in, always in" policy was found in a 5/16/1995 EPA memo that stated that major sources of HAPS may switch to area source status at any time until the "first compliance date" of the standard. Once the first compliance date of the standard had passed major sources subject to that standard would always be subject to the major source requirements of that standard.

Justification

The Columbia Municipal Power Plant ceased coal combustion in September 2015 and at that time became an area source of HAPS. The EP15, EP17, and EP19 RICE were still subject to the major source RICE MACT requirements because Columbia was a major source of HAPS on the "first compliance date" of the RICE MACT. EP15, EP17, and EP19 meet all the major source Subpart ZZZZ requirements. These engines do not meet the requirements for area sources under Subpart ZZZZ. The purpose of the "once in, always in" policy repeal is not to impose additional requirements on sources but to reward sources that control HAPS below major source status by moving them from the more stringent major source MACT standards to less stringent area source requirement.

The City of Columbia believes that they should be able to continue to comply with the major source standards of Subpart ZZZZ instead of the more stringent area source standards. Under 63.6595(b) there are timing requirements for sources switching from an area source of HAPS to a major source of HAPS. These types of sources are allowed additional time to meet the compliance requirements of Subpart ZZZZ. There are no considerations for going the other way because when the rule was written it was not possible. Subpart ZZZZ is not written to allow sources to switch from a major source of HAPS to an area source of HAPS. Under Subpart ZZZZ

there are no regulatory requirements that address the compliance timing of switching from a major source of HAPS to an area source of HAPS.

The EPA “once in, always in” repeal memo does not address any regulatory timing issues associated with additional requirements that major sources must meet if they become area sources. This is because most major source requirements are more stringent than the area source requirements. The Subpart ZZZZ rules are not written to address this issue. The EPA memo also states that the “*EPA anticipates that it will soon publish a Federal Register notice to take comment on adding regulatory text that will reflect EPA’s plain language reading of the statute as discussed in this memorandum*”. The EPA has not published this notice or commented on how this memo should be implemented in cases like the Columbia engines. The City is requesting that EP15, EP17, and EP19 be allowed to continue to follow the major source Subpart ZZZZ requirements. We recommend that MDNR should contact the EPA and get clarity on the applicability of area source requirements of Subpart ZZZZ to EP15, EP17 and EP19. If the major source Subpart ZZZZ requirements are added to the draft permit the “limited-use” limitations will also need to be added to the draft permit.

I’m available to discuss by phone (913-402-4215) or email (steven.babler@powereng.com).

Steven Babler
Air Quality Specialist
POWER Engineers

From: [Fallon, Gail](#)
To: [Dalcher, Debra](#)
Cc: [Torres, Elineth](#); [Castro, Grecia](#)
Subject: RE: Region 8 OIAI question and list
Date: Wednesday, September 05, 2018 12:52:53 PM
Attachments: [Andeavor Ponderosa Request to Rescind Part 71 OIAI.PDF](#)

Debra – Attached is the letter that we sent. I believe OAQPS was already aware of this one but let me know if you need anything else.

Gail Fallon
Acting Air Permitting and Monitoring Unit Chief
EPA Region 8
1595 Wynkoop Street, Mail Code 8P-AR
Denver, CO 80202
(303) 312-6281

From: Dalcher, Debra
Sent: Wednesday, September 5, 2018 10:42 AM
To: Fallon, Gail <fallon.gail@epa.gov>
Cc: Torres, Elineth <Torres.Elineth@epa.gov>; Castro, Grecia <Castro.Grecia@epa.gov>
Subject: RE: Region 8 OIAI question and list

Gail,

Would it be possible to get a copy of the one finalized action for Andeavor Field Services, LLC?

Thank you, Debra

From: Castro, Grecia
Sent: Wednesday, September 05, 2018 12:38 PM
To: Fallon, Gail <fallon.gail@epa.gov>
Cc: Jordan, Scott <Jordan.Scott@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Torres, Elineth <Torres.Elineth@epa.gov>
Subject: FW: Region 8 OIAI question and list

Hi Gail -Many thanks for the helpful information you provide about EPA-issued permit actions. During the RTP APM meeting in June we asked the regions to let us know about actions where sources are taking advantage of OIAI and SPPD is posting this information in a sp site related to the rule development. At that time we also asked for the same type of information from state sources, if it comes your way, since this information will assist us in identifying potential issues as EPA develops the rulemaking. I think that it is not necessary to survey the states about their sources at this stage of the rulemaking process. I will confer with others internally and if there is a reason why we need to

conduct a survey, someone will get back to you in person . Thank you for your help.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

Ref: 8P-AR

Thomas H. Gibbons
Andeavor Field Services, LLC
1801 California Street, Suite 1200
Denver, Colorado 80202

Dear Mr. Gibbons:

Thank you for your letter dated April 9, 2018, requesting to rescind the 40 CFR part 71 (Part 71) Title V operating permit application for the Ponderosa Compressor Station (Ponderosa). Your Title V operating permit application identified Ponderosa as an area source for hazardous air pollutants (HAP) under 40 CFR part 63, subpart HH, but given the EPA's May 1995 guidance memorandum titled, "Potential to Emit for MACT Standards – Guidance on Timing Issues" (known as the "Once In, Always In" policy), Ponderosa was still considered a major source for HAP. When a major source of HAP was required to control emissions or had enforceable controls, the facility still had to adhere to major source standards for any other applicable standards in accordance with 40 CFR part 63, such as the requirement to obtain a Title V operating permit pursuant to 40 CFR § 63.760(h). However, the "Once In, Always In" guidance memorandum has recently been superseded by the January 25, 2018 Assistant Administrator William Wehrum guidance memorandum titled, "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act." This guidance supersedes the earlier "Once In, Always In" guidance by stating that "a major source becomes an area source at such time that the source takes an enforceable limit on its potential to emit (PTE) hazardous air pollutants below the major source thresholds."

This letter serves as written confirmation that Andeavor Field Services, LLC (Andeavor) is no longer subject to the requirement to operate under a Part 71 permit and all associated Part 71 compliance requirements. Enforceable controls of HAP have reduced the PTE for Ponderosa below the HAP major source thresholds through a synthetic minor new source review (MNSR) permit (SMNSR-UO-002178-2017.003), issued by the EPA in accordance with the Tribal Minor New Source Review Permit Program at 40 CFR part 49 and effective on April 6, 2017, which established emissions limits for volatile organic compounds and HAP. Correspondingly, the PTE of the facility is below all major source thresholds under Part 71 and section 112 of the Clean Air Act, and is a minor source for purposes of the Title V program and an area source of HAP for the purposes of section 112. Specifically, 40 CFR part 63, subpart HH exempts area sources of HAP subject to subpart HH from the requirement to obtain a Title V operating permit (§63.760(h)). Andeavor must adhere to the current enforceable controls in the MNSR permit in order to remain an area source of HAP and exempt from the Title V program. Any future proposed operational change, construction, or modification to the facility could be subject to Part 71 and/or section 112 at that time, and it is your responsibility to notify the EPA of such information, as necessary.

If you have any questions or concerns, please contact Mr. Colin Schwartz, of my staff, at (303) 312-6043 or schwartz.colin@epa.gov.

Sincerely,

Monica Mathews-Morales
Director, Air Program
Office of Partnerships and Regulator Assistance

cc: Bruce Pargeets, Director, Ute Indian Tribe Energy & Minerals Department
Minnie Grant, Air Coordinator, Ute Indian Tribe Energy & Minerals Department

Region 4 Reclassification Permits Summary - Deliberative-Do Not Cite or Quote - 10/5/2018

Information presented in this table was summarized from information found in State permits, the statements of basis for those permits, and EPA's ECHO database. Emissions information has not been evaluated.

	Geiger International GA	Denbury Onshore MS	Triangle Brick Company NC	Heritage Home Group – Lenoir NC	Heritage Home Group – Hickory Chair NC	Highland Industries SC
Type of Permit Action	State Op. Permit – 4/27/2018	Title V Sig. Mod. – 8/2/2018	Title V Sig. Mod. - 12/29/2017	Title V Sig. Mod./Renewal - 5/9/2018	Title V Renewal – 6/15/2018	Title V Minor Mod. – 6/4/18
Source Category	Wood Furniture Manufacturing	Enhanced Oil Recovery (EOR)	Brick Manufacturing	Wood Furniture Manufacturing	Wood Furniture Manufacturing	Textile Manufacturing
MACT Removed	Subpart JJ – Wood Furniture Manufacturing	Subpart HH - Oil and Natural Gas Production (includes area sources)	Case-by-case MACT (avoidance of Subpart JJJJ – Brick and Structural Clay Products)	Case-by-case MACT (boilers); Subpart JJ – Wood Furniture Mfg; Subpart DDDD – Plywood and Composite Wood Products	Subpart JJ – Wood Furniture Mfg; Subpart DDDD – Plywood and Composite Wood Products	Subpart OOOO – Fabric Printing, Coating, and Dyeing
Area Source Std. Added	N/A	Area source – no affected sources at facility	N/A	Subpart JJJJJ – Area Source Boilers	Subpart OOOOOO – Foam Production and Fabrication	N/A
Status of MACT Controls or Requirements	Previously complied with MACT by using compliant materials not by using control equipment. All MACT requirements were removed when new state operating permit was issued.	Requirement to have closed vent system to flare and corresponding monitoring requirements kept in permit.	Requirement to operate control equipment (dry lime adsorbers) and corresponding monitoring provisions kept in permit.	Boilers – requirements to operate control equipment (multicyclones) and corresponding monitoring provisions kept in permit. Plywood/Composite wood – previously subject to notification requirements only. Furniture Mfg. - Previously complied	Previously complied with MACT by using compliant materials not by using control equipment.	Previous compliance with MACT: finishing operations – compliant materials, emission rate w/out add-on control, or emission rate w/add-on control; record-keeping to document when switching between compliance options; Slashing operations – using compliant materials. Use of

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				with MACT by using compliant materials not by using control equipment.		the thermal oxidizer is voluntary in revised permit.
PTE Limit	Facility-wide HAP emission limits (<10/25 tpy). Monthly usage records & demonstration calculation (equation specified in permit); 12-month rolling total.	Limitation on low pressure gas vented (147,825 Mscf/yr)	State-enforceable production limit; facility wide emission limits (<10/25 tpy); requirement to operate and monitor the control equipment (dry lime adsorbers).	Facility-wide HAP emission limits (<10/25 tpy). Monthly usage records & demonstration calculation; 12-month rolling total.	Facility-wide HAP emission limits (<10/25 tpy). Monthly usage records (fuel type and HAP containing materials) & demonstration calculation; 12-month rolling total.	N/A
Comments	Facility operated under a Title V permit prior to reclassification. Total HAP actual = 0.4 TPY.	Total HAP PTE TPY: - oil recovery= 11.62 - gas comp./venting = 18.64. Highest HAP PTE TPY: oil recovery (Benzene)= 5.16; comp./venting (2,2,4-trimethyl pentane) < 10	Total HAP TPY PTE/actual = 8.42/7.04 HCl TPY PTE/actual = 3.07/2.84	Total HAP actual TPY = 13.30 Toluene actual TPY = 5.55	PTE limit added in 2013 to avoid Boiler MACT. Highest actual in three most recent inventories: total HAP TPY = 6.48; highest HAP TPY (toluene) = 4.18	True minor source due to closing of collocated facility. A State Operating Permit will be issued upon renewal. Total uncontrolled HAP PTE TPY = 2.72; Highest HAP PTE TPY (Hexane) = 0.884
ECHO	- 26% below poverty line; 93% minority; 36% minors/seniors	- 2014 NEI – Total actual HAP TPY = 7.02; Total Benzene TPY = 2.32; total 2,2,4-trimethyl pentane TPY = 0.56 - 29% below poverty line; 41% minority; 40% minors/seniors	- 51% below poverty line; 82% minority; 42% minors/seniors	- 45% below poverty line; 27% minority; 42% minors/seniors	- 42% below poverty line; 33% minority; 39% minors/seniors	- 2014 NEI – Total actual HAP = 0.80 tpy; Total Hexane = 0.10 tpy - 46% below poverty line; 53% minority; 42% minors/seniors

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	Mississippi Lime KY					
Type of Permit Action	Title V Sig. Mod. – Proposed Permit					
Source Category	Lime Manufacturing					
MACT Removed	Subpart AAAAA – Lime Manufacturing					
Area Source Std. Added	N/A					
Status of MACT Controls or Requirements	Requirement to operate control equipment (baghouse) and monitoring provisions kept in permit.					
PTE Limit	Requirements to operate control equipment, CAM plans (baghouses) & COMS; Kiln prod. limit w/associated MRR; facility-wide HAP emission limits (<10/25 tpy). Monthly usage records & demo. calculation (HCl equation in permit); 12- month rolling total.					
Comments	Total HAP TPY PTE/actuals = 7.06/6.19; HCl TPY PTE/actuals = 7.052/6.189					
ECHO	41% below poverty line; 2% minority; 36% minors/seniors					